

CONTINUATION IN SUPPORT OF CRIMINAL COMPLAINT

I, David T. Deuman, Special Agent of the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being duly sworn, depose and state under oath that:

1. Your affiant is an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.
2. I am a Special Agent (SA) with Homeland Security Investigations (HSI), United States Department of Homeland Security, and have been so employed since March 2023. I am currently assigned to the HSI Sault Ste. Marie Office.
3. I am a graduate of the Federal Law Enforcement Training Center (FLETC) academies in Glynco, GA, which includes the Criminal Investigator Training Program and HSI Special Agent Training Program, where I received training in numerous areas of investigation including, but not limited to, weapons trafficking, contraband smuggling, and counter-proliferations. Prior to beginning a career with HSI, I was a Trooper with the Michigan State Police (MSP) from June 2014 to March 2023. During my tenure with MSP, I completed numerous basic and advanced law enforcement trainings to include, but not limited to, the MSP Trooper Recruit School, Basic Canine Handler School, Basic Investigator School, REID Interviewing Techniques and RAID Entry School. I served as a dual-purpose canine handler in the MSP Canine Unit from March 2017 to March 2023. I have completed numerous other law enforcement training courses / seminars throughout my career.
4. During my career as a law enforcement officer, I have conducted and participated in numerous investigations of criminal activity, to include but not limited to the following: illegal firearms trafficking, possession of firearms by prohibited persons, use of a firearm in furtherance of a crime of violence or drug trafficking crime, possession and

distribution of controlled substances, financial/fraud crimes, child exploitation/production of child sexually abusive material (CSAM), criminal sexual conduct, kidnapping and homicide.

5. This continuation is being submitted in support of an application for an arrest warrant in the matter of Ryan Romario DOOKHAN. Your affiant submits that there is probable cause to believe that DOOKHAN did unlawfully, knowingly, and intentionally violate 18 U.S.C. § 2251(a) as between the dates of June 10, 2024 and August 8, 2024, DOOKHAN did persuade a minor to engage in sexual explicit conduct for the purpose of producing a visual depiction of that conduct, and DOOKHAN had reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.
6. The information contained within this continuation is based on your affiant's personal knowledge, training and experience, as well as information provided to him by other law enforcement officers assisting with this investigation. Your affiant has not included each and every fact known to him concerning this investigation. Your affiant has set forth only the facts that he believes are necessary to establish the foundation for an order authorizing arrest of Ryan Romario DOOKHAN.

FACTS AND CIRCUMSTANCES

7. On September 11, 2024, your affiant was contacted and briefed by Tpr. Justin Lidak of the Michigan State Police (MSP) Gaylord Post regarding a child exploitation/child sexually abusive material (CSAM) investigation he was investigating and requested assistance. Tpr. Lidak advised he was dispatched to the residence of an 11-year-old female, hereafter referred to as MV-1, in Petoskey, Michigan after her family discovered she had been engaging in sexual conversations and sending nude photographs to adult men on the Roblox and Justalk applications. Petoskey, Michigan is located within the Western District of Michigan.

8. A forensic interviewer at the Women's Resource Center of Northern Michigan's Child Advocacy Center (CAC) in Petoskey, MI conducted an interview of MV-1. During the interview, MV-1 made the following statements in sum regarding the suspect, identified as Ryan Romario DOOKHAN of Jamaica, NY.

- She met a guy on Roblox who acted like he was her age.
- The guy's Roblox screen name was "Ryan."
- They traded pets in-game. She traded a cat and dog for the best pets in the game, the snow dragon and fire dragon. She described using the chat feature on Roblox to communicate.
- This guy, who she identified as Ryan Dookhan, told MV-1 to download the Justalk application so they could talk.
- She played with Ryan three or four times before he directed her to download the Justalk application.
- Ryan told her his name when they were playing Roblox, and she told Ryan her name was Alex.
- She downloaded the application sometime in or around June.
- She used her grandmother's cellphone to communicate with Ryan.
- She searched Ryan's name on Justalk and added him.

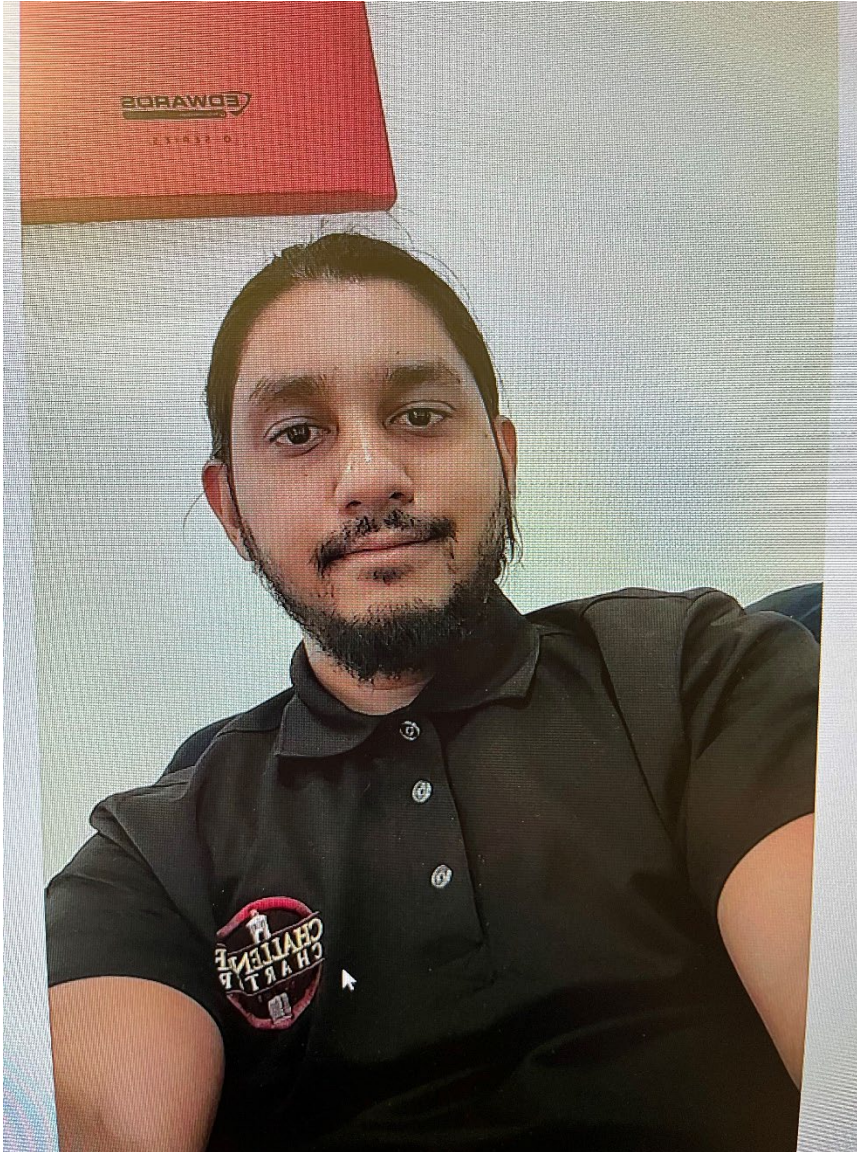
Agent's Note: The username added by MV-1 to communicate with Ryan was "ryandookhan94."

- The first time she called Ryan, he said he would search for her house and take her from her parents if she didn't show her vagina to him.
- Ryan threatened to "do bad stuff" to her.
- She placed the first call, then Ryan kept calling her. She said it was a video call, but he had his camera turned off. She said it was always off.

- She thought her camera was face down, but she couldn't remember.
- She took a few pictures of her body parts and sent them to Ryan because she was scared.
- She identified this body part as her vagina. She wasn't certain, but she didn't think she wore clothing in the pictures.
- She recalled there was multiple pictures of her vagina.
- She sent a picture of her butt with her clothes on.
- Ryan expressed his pleasure in the pictures and asked her to send more.
- She recalled sending Ryan one picture of her buttocks, and two or three pictures of her vagina.
- She recalled her shorts being down for these pictures.
- She told Ryan she was 16 years old. Ryan told her he was 29 years old, which she found scary.
- At one point, she told Ryan she was 11 years old.
- She said Ryan didn't care; he kept asking for pictures.
- She said Ryan looks like an old man. She recalled he had black hair, a black beard, and looked like a "native" or "Mexican."
- Ryan told her he is from New York, and she said she is from Michigan.
- Ryan sent her one video which she didn't watch.
- Ryan sent her two photographs of his face, which she did see.
- Ryan asked her, "Do you want to see my dick cum?"
- She didn't know what that means and stopped responding.
- Ryan told her to rub her "down there," and she said, "No."
- Ryan replied, "Do it, or I'll find your location."

- She complied, because she was scared.
9. Subsequent consent searches of the phone belonging to MV-1, as well as the phone used by MV-1 to communicate with DOOKHAN were conducted by an MSP Computer Crimes Unit (CCU) Digital Forensic Analyst (DFA) in Traverse City, MI. The DFA's search revealed multiple sexually explicit conversations, photographs and videos sent and received between MV-1 and a user named ryandookhan94 via the Justalk application between the dates of June 10, 2024, and August 8, 2024.
 10. During the conversations, MV-1 sent DOOKHAN multiple nude photos and videos (CSAM) of herself. The CSAM is described as the following:
 1. Video (unplayable) – Image depicts MV-1 touching her vagina with her fingers while wearing underwear.
 2. Video (unplayable) – Image of MV-1's vagina. MV-1 is wearing a pink shirt.
 3. Photograph of MV-1 holding up her pink t-shirt and covering her face exposing her left nipple. MV-1 is not wearing pants and her vagina is visible.
 4. Photo of MV-1 lying on her back while wearing black underwear and her buttocks are exposed.
 5. Photo of MV-1 lying on her back with her legs spread apart and vagina exposed.
 6. Photo of MV-1 lying on her back with her legs spread apart and her vagina exposed. MV-1's face is also visible.
 7. Photo of MV-1 sitting down with her legs spread apart and her vagina exposed.
 8. Video (unplayable) – Image depicts MV-1 touching her exposed vagina with her hand.
 9. Photos of MV-1 sitting down with her legs spread apart and vagina exposed. MV-1 is wearing a white t-shirt.
 11. Furthermore, MV-1 advised DOOKHAN she is 11 years old, but he is not deterred and continued to request CSAM from her. DOOKHAN's name and multiple photographs of his face were obtained from the conversations. The photograph of DOOKHAN shown below depicts him sitting down wearing a polo shirt that bears a logo on the

chest that states, “Challenge Charter School.” Hanging on the wall above DOOKHAN’s head is a red box that states, “Edwards O Series.” Your affiant searched “Edwards O Series” and found it to be a commercial fire suppression system that would be expected to be found in a school or commercial building.



12. Your affiant conducted a search of the Challenge Charter School in New York and found the school is an elementary, middle and high school located at three separate locations, however, are close in proximity to each other. The Challenge Charter School official address is listed as 710 Hartman Lane Far Rockaway, NY. This school is located approximately 8 ½ miles from DOOKHAN's listed address of 11042 160th St. Jamaica, NY.
13. An HSI NY Criminal Analyst conducted a search of DOOKHAN's current employment status. The analyst found DOOKHAN is a licensed security guard in the state of New York. Your affiant contacted HSI New York duty agents and inquired about further employment information. HSI New York confirmed DOOKHAN is a New York licensed security guard, however they could not confirm the exact location.
14. The following photograph and Department of Motor Vehicles (DMV) information for Ryan DOOKHAN was obtained by and HSI NY Analyst.



Subject Information	
Name:	DOOKHAN,RYAN,ROMARIO
ClientID:	669210825
Case Number:	
DMV Transaction Number:	1745649
DMV Transaction Date/Time:	2024-11-22 13:31:16:950

15. DOOKHAN stated via Justalk to MV-1 on five occasions over four dates that he was in school and declined to answer video call attempts from MV-1. Specifically, on Tuesday, June 11, 2024, between 0933 hours and 0956 hours, DOOKHAN declines a call from MV-1 and states he can't call because he is in school. DOOKHAN then sends

the photo of him wearing the Challenge Charter School polo as previously described. MV-1 one later asks DOOKHAN why he is in school since she is on summer break. DOOKHAN responds, “it’s my job.” Furthermore, HSI Analysts were able to locate the email address associated with DOOKHAN of, teacher_boy_4_life@yahoo.com further suggesting DOOKHAN’s relationship as a school employee.

16. On August 16, 2024, Tpr. Lidak obtained and served search warrants to Justalk seeking information related to the account: ryandookhan94. On September 10, 2024, Justalk responded to the search warrant with IP address information for the account.
17. On September 12, 2024, your affiant issued subpoenas related to the obtained IP address from Justalk to Verizon Communications. Verizon responded to the subpoena and provided the following information:
 - Customer Name: roberto dookhan
 - Account Address: 110-42 160, JAMAICA, NY 114330000
 - Daytime Telephone: 2567500290
 - Email Address: roberto_dookhan@yahoo.com
18. Roberto Dookhan was identified as suspect Ryan DOOKHAN’s older brother. Both Roberto and Ryan DOOKHAN reside at the same address of 11042 160th St. Jamaica, NY 11433. This address is listed on Ryan DOOKHAN’s New York driver’s license. Additionally, Ryan DOOKHAN’s date of birth is consistent with the age of 29 which he proclaimed to MV-1.

Based upon the aforementioned, as stated above, your affiant respectfully requests that a warrant for arrest for Ryan Romario DOOKHAN be issued, in violation of 18 U.S.C. §§ 2251(a) as between the dates of June 10, 2024 and August 8, 2024, DOOKHAN did persuade a minor to engage in sexual explicit conduct for the purpose of producing a

visual depiction of that conduct, and the visual depiction was produced or transmitted by materials affecting interstate commerce.